

Re: RM-10786

Dear Reviewer,

My comments are offered in support of RM-10786.

Technician Class Amateur Radio licensees are restricted from HF access due to the now unnecessary barrier posed by Element 1 Morse code testing. A radio service with underutilization of existing human resources is the net effect of this disparity. In its acceptance of RM-10786 the Commission will permit the Amateur Service to deploy a force of additional licensees in circumstances where HF radio circuits are needed to facilitate emergency communications. This is in the Public Interest.

My operating activities include CW transmission of Morse code but I take exception to comments portraying telegraphy as essential to the Basis and Purpose of Amateur Radio. It is significant that Part 97 of the FCC's Rules and Regulations states, as the first principle under Basis and Purpose, the following: "Recognition and enhancement of the value of the Amateur Service to the public as a voluntary non-commercial communication service, particularly with respect to providing emergency communications."

In daily operation since 1949, The National Traffic System (NTS) is an excellent example of the Basis and Purpose of Amateur Radio in action. The following concerning transmission modes is from Section II, Chapter 1.2, Public Service Communications Manual, American Radio Relay League, 1996:

"The National Traffic System is not dedicated specifically to any mode or to any type of emission, nor to the exclusion of any of them, but to the use of the best mode for whatever purpose is involved. The aim is to handle formal written traffic systematically, by whatever mode best suits the purpose at hand. Whether voice, CW, RTTY, AMTOR, packet or other digital mode is used for any specific purpose is up to the Net Manager or Managers concerned and the dictates of logic. There is only one National Traffic System, not separate systems for each mode. Modes used should be in accordance with their respective merits, personnel availabilities and liaison practicalities. Whatever mode or modes are used, we all work together in a single and thoroughly integrated National Traffic System."

The National Traffic System does not rely on any one emission type and neither does Amateur Radio at large. Arguments positioning CW Morse code as anything more than one of many transmission mode options are derived from someplace other than contemporary realities within the Amateur Service.

Many comments from fellow Amateur Radio Operators touch on related topics with respect to License Classes, Operating Privileges, Examinations, Spectrum Management, etc. I agree the time has come for an overhaul of Part 97 to position the Amateur Service as an even more effective national resource. These issues need to be addressed in due time. However, I agree with the Petitioner that RM-10786, in its clear and straightforward language, should be adopted without delay.

Respectfully submitted,

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